

May 8, 1998

Dr. C.W. Jameson  
National Toxicology Program Report on Carcinogens  
MD EC-14  
P.O. Box 12233  
Research Triangle Park, NC 27709

Dr. Jameson,  
UV Process Supply is a manufacturer and distributor of over 2,500 products dedicated to the ultraviolet curing of polymeric materials. We are quite concerned with the general portrayal of UVA, UVB and UVC in the National Toxicology Program's background document [entitled *RC Draft Background Document for UV Radiation* (9/29/97)] which supports NTP's recommendation to classify solar radiation and the use of sunlamps and sunbeds as "known to be a human carcinogen."

UV curing of polymeric materials is being increasingly utilized by a growing number of industries, and has established itself as a production process of choice in industrial sectors as varied as printing, packaging, automotive, optical fiber production, metal decorating, and wood finishing. Typically, a UV coating operation uses arc lamps or microwave-powered electrodeless lamps with wavelengths from 200 to 450 nanometers and into the visible light range. The UV equipment used for these applications is specifically designed to minimize incidental exposure in the workplace, and is designed to meet all current casual exposure health standards.

Major corporations in North America and around the world utilize this process and have considered it to be safe. Current equipment design and worker safety practices already incorporate several precautions to minimize and avoid direct exposure to UV. In addition, UV curing provides significant process advantages over conventional solvent- and water-based techniques including almost zero VOC emissions, lower energy consumption, less space, higher productivity, higher quality, and appreciable value-added content.

We understand from the Federal Register notice [63 Fed. Reg. 13418, (3/19/98)] that NTP intends for the "known to be a human carcinogen" classification to apply only to solar radiation and the use of sunlamps and sunbeds. A review of the deliberations of NTP's Board of Scientific Counselors (Oct 30-31, 1998 meeting minutes) confirms that NTP intended to present an overview of the science in the background document, but remained focused, for purposes of the proposed classification, on the use of sunlamps and sunbeds. Further, the Board's deliberations indicate that NTP intends for its classification to be consistent with the 1992 classification by the International Agency for Research on Cancer. In IARC's 1992 Monograph, its Group 1 "carcinogenic to humans" classification, which appears comparable to the NTP's "known to be a human carcinogen" classification, is limited to solar radiation.

UV is a crucial part of many safe and increasingly accepted commercial technologies, including UV coatings applications. Accordingly, the American Conference of Government Industrial Hygienists (ACGIH) has reviewed the science and established Threshold Level Values (TLVs) for occupational exposure to UV in the spectral region between 180 and 400nm. These values represent conditions under which nearly all workers may be repeatedly exposed without adverse health effects. The TLVs apply to exposure of the eye or skin to UV from arcs, gas, and vapor discharges, and fluorescent, incandescent, and solar sources (ACGIH has separate TLVs for UV laser applications).

We appreciate NTP's review of the science in this area; however, we believe the background document is not as accurate or as precise as required to reflect NTP's true intent, and may be open to misinterpretation. As NTP is only issuing a classification for "Solar Radiation and the Use of Sunlamps and Sunbeds" (areas with intended human exposure), NTP should be very clear on this point in the background document.



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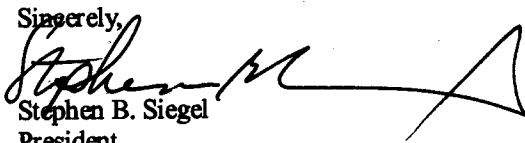
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While we do not oppose NTP's classification as such, we do oppose this classification for all natural and artificial sources of UV. If NTP intends a more narrow construct that is consistent with IARC, then the NTP recommendation on UV should be delayed until the executive summary and any other relevant portions of the background document are further revised. Otherwise, references to the background document could result in serious, unintended consequences for our industry.

We appreciate your consideration of these comments.

Sincerely,



Stephen B. Siegel

President

UV Process Supply, Inc.